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May 17, 2020

VIA ECF AND EMAIL

The Honorable Loretta A. Preska
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
PreskaNYSDChambers@nysd.uscourts.gov

Counsel's request for an extension until June 17, 2020, is granted. SO ORDERED.

Loretta A. Preska

5/18/2020

RE: *United States v. Rafael Romero*, 88-cr-642 (LAP)

Dear Judge Preska:

On April 17, 2020, Your Honor appointed me to represent Rafael Romero in connection with his *pro se* motion for compassionate release pursuant to 18 U.S.C. § 3582(c)(1)(A) and ordered that I could supplement Mr. Romero's application no later than 30 days after the date of my appointment. I am writing to request an additional 30 days, until June 17, 2020, to file supplemental information with Your Honor. I have consulted with AUSA Kaylan Lasky, and the Government consents to this request.

I have been actively investigating the merits of Mr. Romero's application, but Mr. Romero is not fluent in English and I have only been able to have one attorney-client telephone call with him and an interpreter. Mr. Romero's family lives in the Dominican Republic and my communications with them also require an interpreter. Finally, because this is an old docket limited information is available on ECF, and documents from the Dominican Republic are difficult to secure and will need to be translated. These factors, plus the limitations imposed by the COVID-19 pandemic, compel me to request more time so that I can be able to provide adequate counsel to Mr. Romero.

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow